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March 9, 2012

By ECF

The Honorable Joseph F. Bianco
United States District Court Judge
Eastern District of New York
100 Federal Plaza, Room 920
Central Islip, New York 11722

Re: *United States v. Bedell*
Docket No. 11-CR-254

Dear Judge Bianco:

As you are aware, I am attorney for Ms. Bedell, who is currently at liberty on bail conditions consisting of an unsecured bond and an unmonitored night-time curfew. To date, Ms. Bedell has complied with all conditions of her release. I write to respectfully request a modification of her conditions of release.

Ms. Bedell has recently obtained employment at the Estee Lauder Factory in Farmingdale, New York. She has been assigned the over-night shift, working from approximately 11:00 p.m. to 7:00 a.m. For this reason, I ask that the night-time curfew monitoring be eliminated from her conditions of release on days that she is scheduled to work.

I have conferred with AUSA Burton Ryan who offers his consent to this application.

Thank you for your consideration.

Very truly yours,


KEVIN J. KEATING

KJK/mag
/cc: AUSA Burton Ryan
US Pre-Trial Services

SO ORDERED:

Hon. Joseph F. Bianco